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**IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

RAYMOND SKELTON,)	
)	Civil Action No. 1:19-cv-18597-RMB-
)	SAK
)	
<i>Plaintiff,</i>)	
v.)	
)	<i>DOCUMENT FILED</i>
)	<i>ELECTRONICALLY</i>
VICTORIA L. KUHN, et al.,)	
)	
)	
<i>Defendants.</i>)	

**PLAINTIFF'S SECOND UNOPPOSED MOTION
FOR EXTENSION OF TIME TO SERVE DEFENDANTS**

Plaintiff, Raymond Skelton, by and through undersigned counsel, hereby respectfully moves the Court for an extension of the current deadline for service of process of the Second Amended Class Action Complaint and the filing of affidavits of service applicable under Rule 4 of the Federal Rules of Civil Procedure. In support thereof, Plaintiff states the following:

1. Plaintiff filed their Second Amended Class Action Complaint on December 15, 2022. (ECF 44).

2. On December 21, 2022, Plaintiff served Rule 4 Notices of Lawsuit and Requests for Waiver of the Service of Summons to all Defendants “care of” Daniel Shehata, the Office of the Attorney General.

3. On December 23, 2022 Mr. Shehata responded stating the only Defendant he was currently able to accept service for was Mr. Hicks, and he would follow-up regarding if their office gets permission to accept service on behalf of the remainder of the Defendants.

4. On February 27, 2023, Mr. Shehata advised Plaintiff’s counsel that his office had made contact with, and intends to represent, five (5) of the Defendants (aside from Mr. Hicks). Upon learning this information, Plaintiff’s counsel reissued Rule 4 Notices and Waivers to the Defendants indicated and sent them to Mr. Shehata to execute on their behalf.

5. On March 8, 2023, Plaintiff filed its first Unopposed Motion for Extension of Time to Serve Defendants (ECF 49), which the Court granted on March 9, 2023 (ECF 50).

6. Since the first service extension was granted, Plaintiff has successfully made personal service on Defendants Juliette Ekemezie (ECF 51), James

Crackovich (ECF 52), Gabriel Guaciaro (ECF 53), Patricia Esch (ECF 54), and Sylvia Brunson (ECF 55).

7. On April 13, 2023, Mr. Shehata returned executed Rule 4 Waivers as to Defendants Willie Bonds, Jonathan Branganza, James Frank, Victoria L. Kuhn, and Erin Nardelli. (ECF 56)

8. On April 13, 2023, Defendants' counsel requested that Plaintiff agree to an extension of time for Defendants to respond to the Second Amended Complaint to and including June 27, 2023. Plaintiff did not oppose this request, and Mr. Shehata stated he would be filing a letter with the Court regarding the extended time period for Defendants' to respond to the Second Amended Complaint.

9. On April 26, 2023, Mr. Shehata returned executed Rule 4 Waivers as to Defendants Annie Motley, Giancarlo Marcucci and Michael O'Connell. (ECF 60)

10. Mr. Shehata has represented to Plaintiff's counsel that his office expects to eventually represent all of the named Defendants in this action, pending receipt of representation requests and cleared conflicts checks.

11. As of April 27, 2023 two (2) Defendants remain to be effectively served: Candyce Myers (refused service when contact was made) and Jamil Howard.

12. Plaintiff has continued to make extensive good faith efforts to communicate with other counsel in order to timely and cost effectively serve the many Defendants in this case.

13. Due to the large number of Defendants, it has been difficult for Plaintiff's counsel to locate and make contact with all Defendants.

14. Counsel for Defendants have not indicated whether or not they have made contact with the remaining two (2) Defendants.

15. The current deadline to serve Defendants with the Second Amended Complaint is May 1, 2023. Plaintiff is requesting additional time, to and including June 27, 2023, to locate and serve the remaining two (2) Defendants.

16. The undersigned has conferred with counsel for Defendants, Mr. Shehata, and they do not oppose this request.

17. This request is not filed for the purpose of delay, and no party will be prejudiced by the granting of this motion.

Dated: April 27, 2023

Respectfully Submitted,

/s/Keith Altman

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CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2023, I served the foregoing document upon all parties by filing this document on this court's CM/ECF electronic filing system which will send a true copy to all counsel of record.

/s/ Solomon M. Radner
Attorney for Plaintiffs and the Class